

Exhibit 15

CERTIFIED COPY

Monique Russell

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

- - - - - X
MONIQUE RUSSELL, JASMINE :
RIGGINS, ELSA M. POWELL :
and DESIRE EVANS, : Civil Action No.
Plaintiffs, : 18-5629
v. :
EDUCATIONAL COMMISSION FOR :
FOREIGN MEDICAL GRADUATES, :
Defendant. :
- - - - - X

Videotaped Deposition Of MONIQUE RUSSELL
Washington, D.C.
Monday, September 16, 2019
1:51 p.m.

Job No. 88394

Pages: 1 - 136

Reported by: Dana C. Ryan, RPR, CRR, CSR (GA)

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1 A P P E A R A N C E S

2

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20

21 Also present:

22 David Campbell, Videographer

23

24

25

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1

2

E X H I B I T S C O N T I N U E D

3

(Attached to the Transcript)

4

RUSSELL DEPOSITION

PAGE:

5

Exhibit 4 Medical Records From Major

91

6

Medical, LLC, For Monique

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Russell, Bates Stamped

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Plaintiffs0000118654 Through

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0000118679

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Exhibit 5 June 27, 2017 Facebook Post

105

11

By Monique Russell To The

12

MaMa Sisterhood Of Prince

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George's County Facebook

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Group

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Exhibit 6 Stipulation Of Dismissal

113

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Without Prejudice, Bates

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Stamped Plaintiffs0000118860

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Through 0000118863

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Exhibit 7 Plaintiff Monique Russell's

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Responses To Defendants'

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Requests For Admission

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1 The oath that you just took from the
2 court reporter is the same one that you would take
3 in a court of law before a judge and a jury.

4 Do you understand that?

5 A Yes, I do.

6 Q And the court reporter sitted to my --
7 seated to my left is taking down my questions and
8 your answers into a little booklet that will be
9 transcribed, and you'll have the opportunity to
10 review after we complete the deposition today.

11 Do you understand that?

12 A Yes.

13 Q And, so, because she's going to be
14 taking down the questions and the answers, it's
15 important that we try not to talk over top of each
16 other because she can't take us both down at the
17 same time.

18 I'll try to do that on my part. Will
19 you -- will you do the same?

20 A Yes.

21 Q We also have a videographer here who's
22 taking the deposition on video so that we'll be
23 able to see the questions and answers as well.
24 But even so, the court reporter -- it's hard for
25 her to take down nonverbal responses. So a shake

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1 meetings.

2 Q And when you say the two schools, there
3 are two separate schools in Costa Rica?

4 A No, they call them schools. Country
5 Day School is a campus that goes from early
6 childhood to high school, and so there are four
7 schools, the early childhood, elementary, middle
8 and high school, and I work with the two lower
9 schools.

10 Q And are you in Costa Rica by yourself,
11 or is your family with you?

12 A My family is with me.

13 Q And who is that that's with you there?

14 A My husband and my son.

15 Q Okay. And your husband's name is?

16 A Christopher William Russell.

17 Q Okay. And how old is he?

18 A He is -- how old am I? -- 46.

19 Q And your son?

20 A Is Luka.

21 Q Okay. And how old is Luka?

22 A Three.

23 Q Okay. And was Luka born or May 25th,
24 2016?

25 A Yes.

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1 Q Okay. Do you have any other children?

2 A No.

3 Q And how long have you been married?

4 A For five years in October.

5 Q Okay. And you are here in Washington,
6 D.C. today having returned from Costa Rica;
7 correct?

8 A Yes, I flew from Costa Rica.

9 Q Okay. And when did you arrive here in
10 Washington?

11 A Last night..

12 Q Okay. And what, if anything, have you
13 done to prepare to come and testify here today in
14 this deposition?

15 A I reviewed my interrogatories and the
16 paperwork of the course --

17 Q Uh-huh.

18 A -- of the case, but that's about it.

19 Q Okay. You -- you have filed, as I
20 understand it, two different lawsuits related to
21 your interactions with a Dr. Charles Akoda;
22 correct?

23 A Yes.

24 Q Did you review materials related to
25 both of those cases before coming in to testify

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1 Q And if I understand from your discovery
2 responses in the case, you believe that you found
3 out about the fact that Dr. Akoda, who I believe
4 helped deliver your son, Luka, you found out he
5 had pled guilty in June of 2017?

6 A I'm not sure if that's the time, but if
7 that's what your record shows, probably.

8 Q We can go through, and we probably will
9 go through, some of the questions. I'm not trying
10 to -- to trick you on that, so . . .

11 Why don't you tell me just generally
12 how you came to learn about any issues with
13 Dr. Akoda?

14 A Sure. So I -- in the neighborhood
15 where I lived at the time, there was a parent
16 listserv where people would post recommendations
17 or ask for advice and things like that. And
18 someone asked for a recommendation for an OB/GYN.
19 And I wanted to recommend my OB/GYN, Dr. Waldrop,
20 but I wanted to make sure that the person knew if
21 they went to Dr. Waldrop that there was a chance
22 that they would end up having their baby delivered
23 with Akoda, and I did not have a good experience
24 with him during the delivery, and so I wanted to
25 make sure the person was aware of that.

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1 And I went to his Web site to confirm
2 the spelling of his name, and he wasn't on their
3 Web site anymore. So I went and looked at my
4 paperwork, confirmed the spelling, I looked him up
5 to see like, maybe he moved somewhere else so that
6 wouldn't be an issue for this person. And I
7 discovered a press release from the Department of
8 Justice saying that he had been arrested for
9 charges of fraud very shortly after he performed a
10 C-section on me.

11 Q And the physician that you mentioned,
12 Dr. Waltrop?

13 A Waldrop.

14 Q Waldrop. That was your OB/GYN?

15 A Yes.

16 Q How long -- when did you first start
17 going to see Dr. Waldrop?

18 A I'm not sure. Maybe three months into
19 my pregnancy.

20 Q And how did you come to start visiting
21 Dr. Waldrop?

22 A She was recommended by a woman that I
23 met on the hospital tour.

24 Q Okay. And what hospital was that?

25 A P.G. County, Dimensions Hospital.

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1 earlier that -- that Luka was born in May of 2017;
2 correct?

3 A Yes.

4 Q And was he born by C-section?

5 A Yes.

6 Q And was that a planned C-section?

7 A No, it was not.

8 Q What were the circumstances that led to
9 him being born by C-section?

10 A I had been in labor for, I believe, 32
11 hours at that point, and after a period of time,
12 they recommended that I take a drug called Pitocin
13 that they hoped would -- Akoda recommended it to
14 speed up contractions so that I would dilate.

15 Q Uh-huh.

16 A It did not have that effect.

17 And then after 30, 32 hours, he
18 recommended an epidural. Immediately after he did
19 the epidural, he said that my baby was in distress
20 and that he needed an emergency C-section.

21 Q Okay. And was your original plan for
22 birth to go to the hospital and have someone from
23 Dr. Moore's practice deliver vaginally?

24 A Yes, that was my original plan.

25 Q Okay. I saw a reference in your

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1 lower school; right?

2 A Yes.

3 Q Okay. And I understand that you, as
4 you've said in -- in written responses to
5 interrogatories, that you -- you have suffered
6 from emotional distress as a result of learning
7 about Dr. Akoda; is that right?

8 A Yes.

9 Q And what in particular is it that you
10 are experiencing as a result of what you found out
11 about Dr. Akoda?

12 A I feel violated by Dr. Akoda. I feel a
13 sense of distrust in the medical community in
14 general. Like I wouldn't want, for example, to go
15 find a therapist to see to talk to about these
16 things because how do I what their certification
17 is worth or their licensure is worth based on how
18 far doctor -- not even a doctor, how far Akoda got
19 with false papers.

20 I don't trust the institutions that are
21 in place to -- to check that these doctors are who
22 they say they are, doing the right thing, or have
23 the credentials they do, which makes it very hard
24 for me to then use sources I would have used to
25 check on a doctor.

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1 And I don't feel equipped to do
2 background checks on doctors myself.

3 I feel violated, and it makes it very
4 difficult to -- I'm sorry. It makes it very
5 difficult to see an OB/GYN.

6 Q And I take it that when you found out
7 about Dr. Akoda's guilty plea regarding the use of
8 Social Security numbers, that . . .

9 MR. SHAFFER: There's some tissues back
10 there.

11 BY MR. SHAFFER:

12 Q Here you go.

13 I take it when you found out about the
14 guilty plea, you -- you were angry with Dr. Moore
15 and Dr. Waldrop who you had seen in connection
16 with that pregnancy; right?

17 A No. I was angry in general, but I
18 don't necessarily hold blame or anger towards
19 Dr. Waldrop and Dr. Moore because they relied on
20 sources they should have been able to trust. For
21 example, I was a teacher. I had to have
22 background -- extensive background checks done in
23 order to hold a job within DCPS. So when I rented
24 my basement apartment, and as a mother I wanted to
25 find somebody safe to live in the home with us,

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1 Q And do you know whether Dr. Akoda ever
2 lied to ECFMG?

3 A To my understanding, he did. He used
4 three different Social Security numbers and
5 multiple names to come through and get approved to
6 take boards multiple times.

7 Q Do you know whether Dr. Akoda did a
8 residency in the U.S.?

9 A My understanding is that he started a
10 residency in New Jersey before they discovered
11 that he was a fraud and referred back to the
12 commission to certify foreign medical graduates,
13 and that he was still then approved again through
14 the commission and eventually received residency
15 at Howard University.

16 Q And what's the basis for that
17 understanding?

18 A The court documents that I read from
19 his federal trial.

20 Q This is the -- the guilty plea of
21 Dr. Akoda?

22 A The transcript of the trial.

23 Q Okay. And do you know whether ECFMG
24 certification is sufficient to allow a person to
25 obtain a residency in the United States?

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1 A I don't understand the --

2 Q Well, I -- I -- I've heard you say that
3 you blame ECFMG, at least in part, because I think
4 you've called them the first gatekeeper, and I was
5 trying to understand whether you believe that
6 ECFMG certification in and of itself is sufficient
7 to allow a person to be in a residency program.

8 A I don't think so. I think that it's
9 required for them to be able to take the medical
10 boards in the first place which is a requirement
11 for a residency program.

12 Q And the basis for that understanding
13 is?

14 A The documents that I read from the
15 federal trial.

16 MR. SHAFFER: Okay. Let's go ahead and
17 mark this. You know what? Off the record a
18 second.

19 THE VIDEOGRAPHER: Off the record at
20 3:47.

21 (Recess -- 3:47 p.m.)

22 (After recess -- 3:50 p.m.)

23 THE VIDEOGRAPHER: Back on the record
24 at 3:50.

25 BY MR. SHAFFER:

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1 bottom, 1129, at the top it references questions
2 about substance abuse, and the answer is none.

3 Was that accurate from your perspective
4 there; that if you were asked about substance
5 abuse, you would say there was none?

6 A Yes.

7 Q Okay. And then there's a reference to
8 sexual -- a history of sexual abuse, and the
9 answer is, referenced here again, no; correct?

10 A Yes.

11 Q In connection with your discovery
12 responses, you say that your experiences with
13 Dr. Akoda have flowed into your marriage and
14 created intimacy issues; correct?

15 A Yes.

16 Q In what way has that interfered with
17 your marital relationship?

18 A It has been difficult to be sexually
19 intimate, and it's impacted family planning
20 because we want more children, and that is
21 challenging when it is hard to see an OB/GYN. And
22 it's -- intimacy with my husband is better now,
23 but it's -- it's not like it was before. And
24 after I found out about this, it was very
25 difficult.

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1 And you admit that; correct?

2 A I do.

3 Q So you did not feel that during your
4 visits with Dr. Akoda that you were being abused
5 sexually?

6 A At the time I did not feel that way.

7 Q Do you believe -- do you feel that way
8 now?

9 A I feel violated for a fake doctor to be
10 in my vagina, yes. I feel like I'm a victim of
11 sexual assault now.

12 Q Have you reported that to the
13 authorities?

14 A No, that's why I'm doing a class action
15 lawsuit so that every woman who he has ever seen
16 can be notified.

17 Q Do you know whether any of them have
18 been notified?

19 A I'm sure some have because there have
20 been ads, I understand. I posted where I could
21 notify women. So I know that some have. I don't
22 know how many women there are over the close to
23 ten years that he's been doing this who would
24 still need to be notified.

25 MR. SHAFFER: Let's go off the record